

John H. Grove, John H. Grove Jr. and  
George E. Grove, partners trading as  
Frederick City Garage

vs.

Peris W. Ward, widow; Berkeley Ward Jr.,  
and Florence Miller Ward his wife, and  
Grace H. Ward, all adults.

No. 1098 EQUITY.

In the Circuit Court for Frederick  
County, sitting as a  
Court of Equity.

To the Honorable, the Judges of the Circuit Court for Frederick  
County, Maryland, sitting as a Court of Equity;—

The Petition of John H. Grove, John H. Grove Jr., and George E. Grove  
partners trading as Frederick City Garage, who sue for themselves and for  
and on behalf of all other creditors of Berkeley Ward, late of Frederick  
City, Frederick County, State of Maryland, deceased, who will come in and con-  
tribute to the expenses of this suit, complaining, say;—

1. That the said Berkeley Ward died on or about the 5th. day of  
December, 1924, in Johns Hopkins Hospital in Baltimore City, Maryland, where he  
had been taken several months before for treatment, seized and possessed of  
a piece of real estate situated on Rockwell Terrace in Frederick City,  
Maryland, and being the same land together with the improvements thereon  
which was conveyed to the said Berkeley Ward by Lillian L. Grossnickle by  
deed dated April 4, 1921, duly recorded among the Land Records of said Fred-  
erick County, Maryland, in Liber 335, folio 450, a certified copy of which deed  
is herewith filed as part hereof, marked "Exhibit A".

2. That the said Berkeley Ward was in his lifetime, indebted  
unto your orators, John H. Grove, John H. Grove Jr., and George E. Grove, partners  
trading as the Frederick City Garage, in the sum of Three Hundred ~~and Six~~  
dollars (\$300.00) upon his promissory note dated February 3, 1924, payable  
four months after date with interest from date to said Frederick City Ga-  
rage John H. Grove and Sons Co. said payee in said note being your Petition-  
ers, and upon which no interest has been paid, as will appear by reference  
to said promissory note filed herewith as a part hereof, marked "Exhibit B"  
the amount of said note, principal interest from its date to the time of the  
filing of this Bill, unpaid, being the total sum of \$319.60; and that the said  
Berkeley Ward was in his lifetime, also indebted unto <sup>your</sup> orators in the sum of ~~the~~